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DOCUMENT
ELECTRONICALLY FILED
DOC #:____
DATE FILED:____12/02/2019

November 29, 2019

VIA ECF

Magistrate Judge Katherine Parker United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> Re: Willford v. United Airlines Inc. Case No. 18-cv-1060

Dear Judge Parker,

As you are aware, we are the attorneys for the plaintiff Celeste Wilfred in the above-referenced wrongful termination suit against United Airlines Inc. I respectfully write this letter to request a 35-day adjournment of the follow-up discovery conference scheduled for December 9th (Docket 82) that is, until January 14, 2020.

The reason for the request I regret to say is a personal one. For the past several weeks, I've been experiencing several physical limitations that have not allowed me to function at my usual 100%. Upon further investigation over these weeks, it has been determined that I need to undergo a cardiac ablation procedure, which is currently scheduled for December 13th. I am given to believe, however, that although it is heart surgery, the recovery period should be relatively short. I am no Mick Jagger, but I am hopeful that I will make a speedy recovery and will be able to finish up discovery shortly after the new year. Hence the request for the extension through January 14th.

I may add that per our last conference with Judge Daniels, fact discovery is technically scheduled to end on November 30th. I believe that this application should be made directly to Your Honor, as the Magistrate. However, in an abundance of caution, I will also file a copy of this letter as an exhibit to a formal application to Judge Daniels.

Finally, please be advised that we have conferred with defendant's counsel and they have consented to the adjournment requests under these circumstances. However, in order to accommodate a previously scheduled deposition of an out of town witness, we will be going forward with one deposition on December 3, 2019.

We thank Your Honor for consideration of the above request.

Respectfully submitted,

ABRAMS, FENSTERMAN, FENSTERMAN, EISMAN FORMATO, FERRARA, WOLF & CARONE, LLP

By: ____/s/ Mark L. Furman

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Discovery is extended to <u>January 14, 2020</u>. The status conference currently scheduled for December 9, 2019 is hereby adjourned to <u>January 21, 2020 at 11:30 a.m.</u>

SO ORDERED

12/2/2019

HON. KATHARINE H. PAHKEH UNITED STATES MAGISTRATE JUDGE